

instant Chapter 13 Petition.

7. As of August 8, 2017, Debtors have failed to tender post-petition mortgage payments for the months of June 2017 through August 2017. The monthly payment amount for the months of June 2017 through August 2017 is \$2,256.61, for a total amount due of \$6,769.83. The next payment is due on or before September 1, 2017 in the amount of \$2,256.61. Under the terms of the Note and Mortgage, Debtors have a continuing obligation to remain current post-petition and failure to do so results in a lack of adequate protection to Movant.

8. Movant, **PNMAC MORTGAGE OPPORTUNITY FUND INVESTORS, LLC**, requests the Court award reimbursement in the amount of \$1,031.00 for the legal fees and costs associated with this Motion.

9. Movant has cause to have the Automatic Stay terminated as to permit Movant to complete foreclosure on its mortgage.

10. Movant specifically requests permission from the Honorable Court to communicate with Debtors and Debtors' counsel to the extent necessary to comply with applicable nonbankruptcy law.

11. Movant requests that Federal Rule of Bankruptcy Procedure 3002.1 be waived.

WHEREFORE, Movant respectfully requests that this Court enter an Order;

a. Modifying the Automatic Stay under Section 362 with respect to **379 PINE RUN ROAD, DOYLESTOWN, PA 18901** (as more fully set forth in the legal description attached to the Mortgage of record granted against the Premises), as to allow Movant, its successors and assignees, to proceed with its rights under the terms of said Mortgage; and

b. Movant specifically requests permission from this Honorable Court to communicate with Debtors and Debtors' counsel to the extent necessary to comply with applicable nonbankruptcy law; and

- c. Waiving Federal Rule of Bankruptcy Procedure 3002.1; and
- d. Granting any other relief that this Court deems equitable and just.

/s/ Jerome Blank, Esquire
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